

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CASE NO.**

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THOMAS SHIRLEY,  
Plaintiff,

Judge  
Magistrate Judge

vs.

TRANS UNION, LLC;  
EXPERIAN INFORMATION  
SOLUTIONS, INC; and  
EQUIFAX INFORMATION  
SERVICES, LLC;  
Defendants.

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**TRANS UNION, LLC’S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, on the following grounds:

1. Plaintiff Thomas Shirley served Trans Union on or about January 13, 2022 with a Summons and Complaint to be filed in the 4th Judicial District Court, Hennepin County, Minnesota. Copies of the Summons and Complaint are attached hereto, as **Exhibit A**, and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Attached hereto as **Exhibit C** is a copy of Trans Union, LLC's Notice of Filing Notice Of Removal With the United States District Court to be filed in Hennepin County District Court.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 18-21, 23 and 24.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. As of the date of this Notice of Removal, Defendant Equifax Information Services, LLC has been served. Counsel for Trans Union has contacted counsel for Equifax and they have consented to this removal as evidenced the consent attached hereto as **Exhibit D**. Co-Defendant Experian Information Solutions has not been served.

6. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court for the District of Minnesota.

7. Notice of this removal will promptly be filed with the 4th Judicial District Court, Hennepin County, Minnesota and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota to this United States District Court, District of Minnesota.

Respectfully submitted,

Date: February 1, 2022

/s/ Bradley D. Fisher

Bradley D. Fisher, Esq. (219356)

Amy M. Sieben, Esq. (326021)

Fisher Bren & Sheridan, LLP

920 Second Avenue South, Suite 975

Minneapolis, MN 55402-4011

Office: (612) 332-0100

Fax: (612) 332-9951

E-Mail: [bfisher@fisherbren.com](mailto:bfisher@fisherbren.com)

E-Mail: [asieben@fisherbren.com](mailto:asieben@fisherbren.com)

*Counsel for Defendant Trans Union LLC*